

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

BNY Mellon, et al. v. Islamic Republic of Iran, No. 1:19-cv-11767 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Eric Johnson, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Eric Johnson, and I was the life partner of Janice J. Brown (“Janice”), who died on September 11, 2001 (“9/11”) when the World Trade Center fell. (I have also been appointed as the Administrator of Janice’s Estate by the Kings County, New York Surrogate’s Court.) I submit this Declaration in order to demonstrate that I was the functional equivalent of Janice’s husband.

2. I met Janice in 1982 when we went to High School together in Brooklyn. At that time we were just friends and classmates. We went off to separate colleges. I attended Empire State University and Janice attended Syracuse University. We began dating once Janice came home to Brooklyn after college.

3. After a short time, Janice moved in to live with me in my house on 38th Street in Brooklyn. A few years later (in 1990), our son Justin Johnson was born. I worked as an electrician and Janice worked as an accountant at Marsh & McLennan, Inc. (the professional services firm). We supported Justin and each other, and we lived together as a happy family.

4. A few years later (in 1998) Janice’s sister Dawn had a boy named Kyle (Lewis), and (because of Dawn’s personal problems) Dawn was unable to take care of him. We took

Kyle into our home, and we took care of Kyle as if he were our own son along with Justin. I continued to support and care for both boys after Janice was killed on 9/11. Today Kyle is in the Navy, and Justin is a truck driver.

5. Although we never got legally married, I called Janice my wife and she called me her husband. (When people had a special reason to know, however, we would explain that we were not legally married.) We sometimes spoke about getting formally married, but we still had not done so at the time that Janice was killed.

6. Even though we were not formally married, we did everything a husband and wife do. We lived in our house together. We pooled our finances. (Janice had credit problems, so we held most things in my name.) We raised Justin and Kyle together. We spent all our free time together, attended church together, and spent holidays and special occasions with each other's relatives.

7. I have many, many fond memories of our life together, and so do Justin and Kyle. We especially liked going to the beach together at Riis Park, and taking the boys to the zoo and the amusement parks. (Exhibit A is a picture of Janice, myself and Justin at Justin's baptism. Exhibit B is a picture I took of Janice and Justin at the ice skating rink. Exhibit C is a picture of Janice, Justin and me on a carriage rider (for Justin's birthday). Exhibit D is a picture I took of Janice on a family trip to the zoo. Exhibit E is a picture I took of Justin when we went on a cruise as a family.)

8. A few days before 9/11, I went away on a cruise with some members of my family. Janice was not able to get off of work and come along. I had a strange premonition of danger, but my fear was that something might happen to me rather than to Janice. I certainly never even dreamed that Janice would be killed in a terrorist attack.

9. Janice was the love of my life and the mother of our son Justin. I feel the pain of losing her every day, and so do Justin and Kyle. Janice and I were not legally married, but we were husband and wife in every important sense. I believe that I should be considered as the functional equivalent of Janice's husband.

Executed on: Jun 21 2022

Name (Signature): Eric Johnson

Name (Print): Eric Johnson

EXHIBIT A



EXHIBIT B



EXHIBIT C

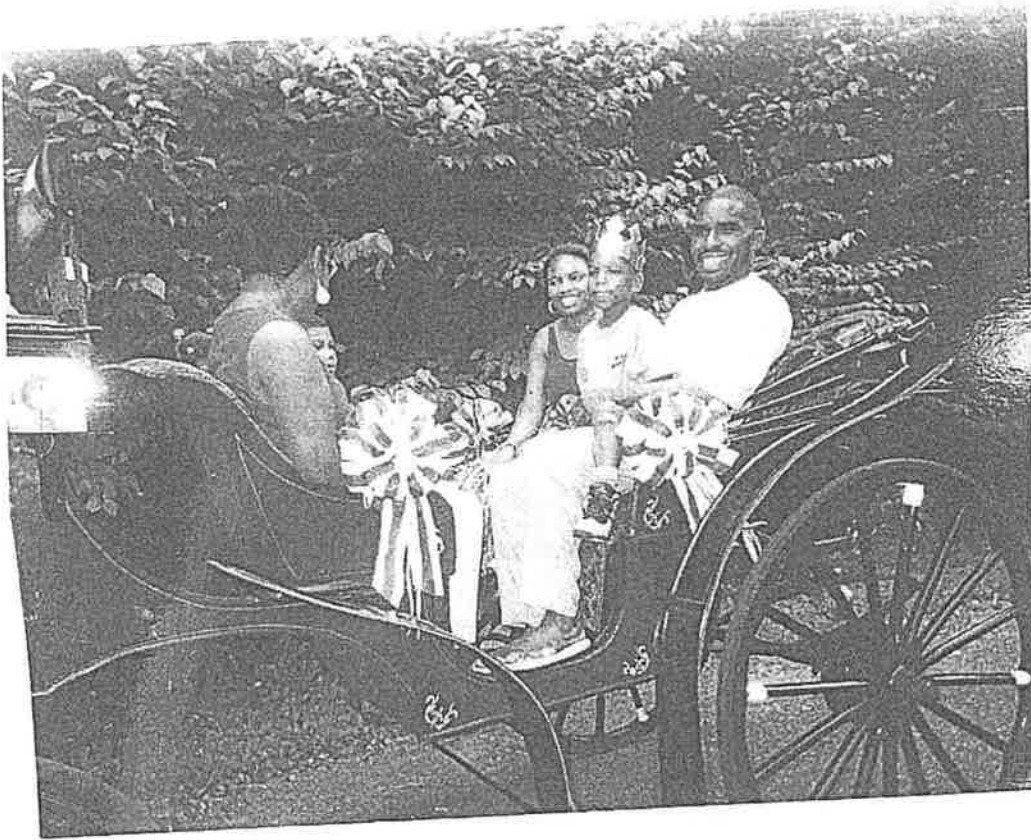


EXHIBIT D



EXHIBIT E

